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**RECEIVED**

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January 23, 1994

FCC MAIL ROOM

Secretary, FCC  
1919 M Street, N.W.  
Washington, D.C. 20554

Subject: Fee increase (doubling) for Ship Station Radio / Operator's License

Reference: "FCC plans to hike radio license fees for boaters" by Dave Workman, Editor,  
National Association of State Boating Law Administrators' Small Craft Advisory,  
Vol. 9 No. 2, Dec 1993.

The referenced article alerted me to the subject proposed fee increase. As a recreational boater, the existing fee of \$35.00 for a ship station license and/or radio operators license is over priced! At any higher level it is unconscionable!

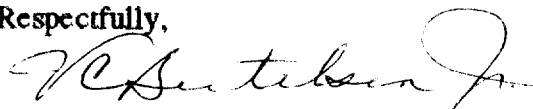
Although enabled with strong legislation for management of the communication radio frequency spectrum and stations, the FCC does little, if anything, for the recreational boater except collect our money. The number of frequencies available to recreational boaters in the marine service is small when compared to commercial and governmental use frequencies and the marine service itself is very small when compared to other user frequency allocations. Further, the FCC does little to police the misuse of the assigned channels except for the occasional "off frequency" notice to operators of older VHF transceivers where such infractions are more likely. The use of improper radio procedures, call signs, channels, etc. provoke no discernable response or action by the FCC. The "CB" service is an undisciplined joke!

If the FCC is short of money there are at least two viable courses of action. 1. Cut costs (i.e. reduce the employees...at the very least those involved in the marine service who do not appear to be doing anything anyway!) and/or 2. cause those who are receiving FCC services to foot the bill (i.e. charge the cellular phone, industrial radio net, broadcasters, governmental units, etc.) for their fair share of the expense of doing what you do for them. Of course, you could examine what you do and eliminate all activity which does not add value and probably reap a significant savings.

One easy approach to reducing personnel cost is to eliminate all positions entitled "assistant (to) \_\_\_\_\_" and "deputy (to) \_\_\_\_\_" and require that the principal position holder do his or her job not delegate it to "assistants" or "deputies"! (Bureaucracy at its finest!). Of course, the people in those positions must go out the door to effect the cost reductions.

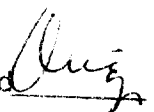
I urge you to abandon any thought of increased fees for any of the licenses currently required for recreational boaters to have and use radio and other electronic safety and navigation equipment. Any increases in fees would surely both reduce the availability and use of such equipment and/or make law breakers of many honest, safety conscious boaters.

Respectfully,



Copy to: Senator Slade Gorton, Representative Jennifer Dunn

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## Missouri Water Patrol may seek dedicated funding

"The biggest priority we have is to get a dedicated fund for the Water Patrol."

That's the observation from Col. Larry Whitten, boating law administrator for the Show Me State and the commissioner of the Missouri State Water Patrol. His remarks came during a retrospective about his agency's ability to respond to devastating flooding last summer.

Money for the dedicated fund would come from a hike in the boating registration and titling fees, Whitten said. So far, the idea has met with no resistance, he noted. The proposed fee hikes are just now in the formative stages, but they

would be nominal at best. The fee would go up \$5 for boats under 16 feet, \$8 for vessels in the 16-24 foot range and between \$10 and \$12 for boats longer than 24 feet. The titling fee could increase by \$2, he estimated.

If the plan comes together and is approved by the state legislature, it could mean an additional \$196,000 annually, and it's money the agency could put to good use.

Said Whitten: "We can't do all the water safety programs we are asked to do now."

It could mean an additional couple

of officers, and that would make a difference, he added.

That point was underscored by the tally of overtime hours reported by Missouri's 65 water patrol officers during the flooding. They put in 15,000 man-hours of overtime.

"Now the people know who the Water Patrol is, and who they can depend on," Whitten said proudly.

Fortunately for Missouri, federal relief funds paid for 75 percent of the overtime, and the state legislature made an emergency appropriation to pay the balance.  $\Delta$

## FCC plans to hike radio license fees for boaters

by Dave Workman Editor,  
Small Craft Advisory

WASHINGTON, D.C. — Private boat owners could get slapped with a 100percent fee increase for their five-year "ship station" radio operator's license, under a plan announced by the Federal Communications Commission.

According to Sean White, an FCC staff attorney in the aviation and marine branch, "Assuming that the rule is adopted by the commission, there will be a public comment period, after which the commission will make a decision. I don't know, and I don't think anybody else does outside the office of the

commissioners, when that will be adopted or refused, but I presume it will occur fairly quickly."

If adopted, the fees would jump from \$35 for a five-year license right now, to \$70. It would leap to \$105 for a ten year license. A ship station license is required for any boat carrying a marine radio, a radar unit or an emergency position-indicating radio beacon (EPIRB). There are concerns that the fee increase will discourage boaters from having safety radio/radar equipment aboard.

Bill Ladd, president of the National Water Safety Congress, said, "As a former search and rescue pilot with the U.S. Coast

Guard, I am concerned that the federal government is increasing license fees for recreational boaters to put safety equipment on their vessels. Having been involved in thousands of search and rescue cases, I have never failed to find a person who had a radio, so I could talk to them."

White told *Small Craft Advisory* that there is no assurance the proposed fee hike will take place, however.

The FCC is reportedly planning to call for public comment on the proposed fee hike, allowing only a 20-day comment period. Boaters wishing to comment can write to the Secretary, FCC, 1919 M Street N.W., Washington, D.C. 20554.  $\Delta$

## New York expects higher BUI arrest rates this year

Thanks to New York's tougher boating under the influence law, boating law administrator Nelson Potter anticipates a hike in the BUI arrest rate.

"The BUI law went into effect last fall," he said, "and we suspect it will triple the arrest rate for the past year."

What gave the new law some additional teeth is a strong implied consent provision. Those who refuse to take that test will have their operating privileges suspended, and a conviction requires that the culprit successfully complete a safe boating course. Also, New York's blood alcohol standard, he said, is .08 for evidence of being under the influence and .10 for being intoxicated.

According to Potter, a class for officers to recognize impaired boaters was held in Ossining, which is the site of Sing Sing Prison. Also this winter, Potter said the state is sending several officers to Yorktown for additional training.

In addition, officers typically attend various boat shows that are held from January through March. There are about a dozen such shows in all, not only in New York but in neighboring states, Potter noted.

While there, the officers answer questions about boating regulations and programs in New York and also hand out plenty of literature.  $\Delta$